



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION  
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JUL 12 2010

CERTIFIED MAIL/  
RETURN RECEIPT REQUESTED

Joel E. Robinson, CHMM  
Global Remediation Manager  
General Electric (GE) Consumer & Industrial  
Appliance Park, AP26-100  
Louisville, Kentucky 40225-0001

**RE: RCRA Facility Investigation (RFI)**  
**Caribe General Electric Products, Inc.**  
**La Brisa #5, Sabana Llana**  
**Río Piedras, Puerto Rico 00924**  
**Ref. No. CEPD-RCRA 10-0153**  
**EPA ID: PRD000692590**

Dear Mr. Robinson:

The U.S. Environmental Protection Agency (EPA) is charged with the protection of human health and the environment under the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 et seq.

Pursuant to the Government Performance and Results Act (GPRA), the Environmental Protection Agency (EPA) is required to establish a baseline of eligible treatment, storage and disposal facilities that needed to comply with specific actions and that were regulated under Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments (HSWA). Specifically, EPA is responsible for tracking progress at these facilities with regard to remediation and/or compliance monitoring for determining the effectiveness of the chosen remedies or stabilization measures (hereinafter referred to as the GPRA RCRA corrective action baseline or baseline), and for reporting this progress to the public.

The U.S. Environmental Protection Agency (U.S. EPA) compiled a list of all facilities deemed appropriate and important to address using RCRA Corrective Action Program. Because this set of 3,880 facilities, of which 51 are located in Puerto Rico, has national remediation goals which will culminate in the year 2020, it is referred to as the 2020 Corrective Action Universe. The facility of Caribe GE Product in Sabana Llana, Río Piedras (GE Río Piedras), Puerto Rico, is part of this 2020 Universe.

This letter is to notify, that GE Río Piedras is subject to RCRA Corrective Action requirements including a RCRA Facility Investigation (RFI). This decision is based on concerns raised by EPA and the findings described in the RCRA Facility Assessment (RFA) Report. Under the provision Section 3004(u), any facility that had applied for a RCRA hazardous waste management permit would be subject to a RFA to identify Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) that are (or suspected to be) the source of releases of hazardous waste or constituents to the environment. If any such SWMUs or AOCs are identified, the owner or operator of the facility will be directed to perform a RFI to obtain information on the nature and extent of the contamination so that the need for Interim Corrective Measures (ICM) or a Corrective Measures Study (CMS) can be determined.

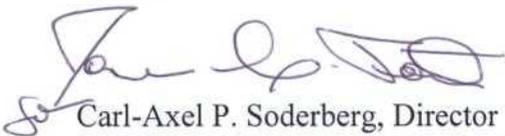
The RFA dated November 1989, which included a Preliminary Review (PR) of all available relevant documents and a Visual Site Inspection (VSI), identified one (1) SWMU and one (1) AOC: The Hazardous Waste Container Storage Area (SWMU #1) and Paint Room (AOC #1). Based on the findings of the RFA, No Further Action (NFA) was recommended for SWMU #1. For AOC #1, further sampling was recommended given the fact that a spill of Cresylic Acid (Cresol) occurred in that area. Although the report mentions that the area was cleaned and that spillage did not exceed facility boundaries, no confirmatory sampling was conducted for this AOC.

According to records, GE Río Piedras conducted clean closure of SWMU #1. Closure activities included soil sampling. On November 30, 1990, EPA approved clean closure for SWMU #1. However, further groundwater sampling in 1992 as part of the Part-B Post Closure Permit Application revealed the presence of Volatile Organic Compounds (VOCs) above Maximum Contaminant Levels (MCLs) at the facility. On September 3, 1992, EPA recommended additional groundwater characterization.

Therefore, pursuant to the RCRA requirements of 40 CFR 264, Subpart F, GE shall submit a site wide RFI Workplan within 90 days of the receipt of this letter to determine the nature and extent of soil and groundwater contamination at the facility and the potential sources of groundwater contamination. This RFI must include the investigation of AOC #1.

If you have any questions regarding this matter, please contact Geol. David N. Cuevas at (787) 977-5856 or through e-mail at [cuevas.david@epa.gov](mailto:cuevas.david@epa.gov).

Sincerely yours,



Carl-Axel P. Soderberg, Director  
Caribbean Environmental Protection Division

cc: Ms. María Rodríguez, Director  
Land Pollution Regulation Program  
Puerto Rico Environmental Quality Board  
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